

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Permit Renewal

Facility Name:	Free Flow Packaging International, Inc.
Facility ID:	43605
SIC Code:	3086
Equipment Location:	6195 E. Randolph Street City of Commerce, CA 90040-3513
Application #(s):	464691
Application Submittal Date(s):	01/18/07
AQMD Contact Person:	Stephen Jiang
Phone Number:	(909) 396-3134
E-Mail Address:	sjiang@aqmd.gov

1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, CO, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Free Flow Packaging International, Inc. 6195 E. Randolph Street, Commerce, CA 90040-3513. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

Free Flow Packaging International, Inc. is a Title V facility that is in the business of processing recycled polystyrene foam products into polystyrene foam packaging materials (loose fills). Free Flow currently operates one polystyrene foam packaging manufacturing system, two boilers and one blowing agent storage tank. The polystyrene foam packaging manufacturing system consists of two extruders, two 1st expanders and one 2nd expander, intermediate storage room, hot room, two final storage rooms, and associated conveyors and hoppers. The VOC emissions from the polystyrene foam packaging manufacturing system are being controlled by a regenerative thermal oxidizer (RTO).

3. Construction and Permitting History

The facility has been in constant operation at this location since 1984 and numerous permits to construct and or permits to operate have been issued to the facility. Since the issuance of the initial Title V permit, a permit revision was subsequently issued to the facility on January 11, 2011. The permit revision reflects the approval of the installation of Permanent Total Enclosures (PTE's) to enclose the two extruders and three expanders, and additional booster blowers to vent the new PTE's to the existing RTO.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS or NESHAP requirements.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and

CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

The VOC emissions from the polystyrene foam packaging manufacturing system are being controlled by the RTO. The uncontrolled VOC emissions to the RTO are greater than the major source threshold for 10 tons per year. As a result, the RTO is subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions have been added to satisfy the CAM requirements. Such permit conditions were developed using the design criteria and other pertinent requirements identified in 40 CFR 64 - Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2010

Pollutant	Emissions (tons/year)
NO _x	0.700
CO	0.459
VOC	20.073
PM	0.099
SO _x	0.003

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2009**

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	233.28
Benzene	0.103
Formaldehyde	0.22
Naphthalene	0.003
PAHs, total, with components not reported	0.001

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The facility was determined to be exempt from AB2588 requirements.

8. Compliance History

As noted, the facility has been in constant operation since 1984. The facility has had no citizen complaints filed in the last two years. However, in the recent two years, the applicant was issued two Notices of Violation, which are indicated as follows:

- Notice of Violation (NOV P50849) issued on 8/13/2009 for failure to comply with the permit limit (Permit No. D53160 – Cleaver Brooks Boiler) for carbon monoxide (CO) emissions.

Compliance Status: On 9/2/2009, the facility provided test results for a test performed on 08/17/2009. The test results indicated CO emissions were within the permit limit; and thus, the facility achieved compliance 9/2/2009.

- Notice of Violation (NOV P54285) issued on 9/7/2010 for 1) failure to comply with the permit limit (Permit No. D53160 – Cleaver Brooks Boiler) for NOx and CO emissions, and 2) failure to comply with the permit limit (Permit No. F16269 – Parker Boiler) for CO emissions.

Compliance Status: 1) Failure to comply with Cleaver Brooks Boiler Permit No. D53160 – The facility currently is operating this boiler under a stipulated Order of Abatement (Hearing Board Case No. 3664-5). Compliance is achieved.

2) Failure to comply with Parker Boiler Permit No. F16269 –On 9/28/2010, the facility provided portable analyzer test results for a test performed on 9/28/10. The test results indicated CO emissions were within the permit limit; and thus, the facility achieved compliance 9/28/10.

The facility is currently operating in compliance with all applicable rules and regulations.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.